

links the meeting requests and O'Connor's ability to "make [the contribution] happen."²⁷²

Likewise, O'Connor asserts that Patricia Hotung (with whom he admittedly never spoke about this contribution) was committed to making the donation, regardless of the meeting requests.

Nonetheless, internal O'Connor & Hannan documents and bank records reflect that the contribution monies were sent to a trust account controlled by the firm on behalf of the client's spouse, and that O'Connor did not "trigger"²⁷³ the payments from the trust account to the DNC bank account until the day after Eric Hotung's meeting with Berger.

In both this instance and the Hudson matter, the meeting set with Fowler for O'Connor and his clients was set up by DNC Deputy Finance Director Mercer.²⁷⁴ In each case Mercer provided Fowler a written briefing in advance of the meeting. In the second instance, Fowler also had the stark information related by O'Connor's Sept. 7 letter. Thus, despite Fowler's claim that he found it intolerable to link a contribution to any specific conduct on his part, this second incident suggests that he engaged in just such an arrangement. Further, it suggests that O'Connor anticipated that the proposal he presented to Fowler in the Sept. 7 letter would be well-received, perhaps on the basis of his experience with Fowler in the Hudson matter. Though this second incident involved a client request that, by all available information, amounted to no more than a

²⁷²Fowler G.J. Test. at 216.

²⁷³Memorandum from Thomas Corcoran to James Symington, Oct. 5, 1995.

²⁷⁴As noted earlier, Mercer also planned the O'Connors' March 5 luncheon. The March 3 briefing Mercer provided Fowler for that event stressed the need to solicit the guests' "advice and counsel and their financial support over the coming months." Mercer noted that the guests had "particular concerns" to which the Chair should provide "some level of responsiveness to encourage future participation and financial support." In pursuit of these goals, Mercer's talking points advised Fowler to "[s]peak to more efficient and effective communication between the Party and the White House."